

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TRACEY WHITE, et al.,)	
)	
Plaintiffs)	
)	
v.)	Cause No. 14-cv-01490 - HEA
)	
THOMAS JACKSON, et al.,)	
)	
Defendants.)	

**MOTION OF DEFENDANTS JON BELMAR, SGT. DAVID RYAN, OFFICER
TERENCE MCCOY, OFFICER MICHAEL MCCANN, DET. DERIK JACKSON, DET.
JOE PATTERSON, DET. AARON VINSON, DET. WILLIAM BATES, DET. NICHOLAS
PAYNE, OFFICER DANIEL HILL, OFFICER ANTONIO VALENTINE, AND ST.
LOUIS COUNTY FOR LEAVE TO FILE DOCUMENT UNDER SEAL**

COME NOW Defendants Jon Belmar, Sgt. David Ryan, Officer Terence McCoy, Officer Michael McCann, Det. Derik Jackson, Det. Joe Patterson, Det. Aaron Vinson, Det. William Bates, Det. Nicholas Payne, Officer Daniel Hill, Officer Antonio Valentine, and St. Louis County, Missouri, (“St. Louis County Defendants”), and ask for leave to File A Document Under Seal in connection with their Motion for Summary Judgment. As grounds for the Motion, Defendants state as follows:

1. Defendants are desirous of filing the medical chart of Plaintiff Nathan Burns with the Court as Exhibit E in connection with their Motion for Summary Judgment.
2. In order to be respectful of Plaintiff Burns, and not to make his medical record public at this time, defendants ask for leave to file their Exhibit E medical chart under seal. The Exhibit is a complete copy of Plaintiff Burns’ medical chart that is maintained by Defendant St. Louis County, and that was produced to plaintiffs through discovery.

WHEREFORE, for the above stated reasons, defendants ask this Court to file the above described Exhibit E in support of their Motion for Summary Judgment under seal.

Respectfully submitted,

PETER J. KRANE
COUNTY COUNSELOR

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served on all counsel of record through the Court's electronic filing system this 13th day of May, 2016.

/s/ Priscilla F. Gunn